

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:14-CR-00184-WDQ

TAAVONE EVANS

**SECOND JOINT MOTION TO EXCLUDE TIME FROM THE REQUIREMENTS OF THE SPEEDY TRIAL
ACT**

Pursuant to 18 U.S.C. § 3161 (h)(7)(A), the government and defendant Mr. Taavone Evans jointly move to exclude from calculation of the time requirements established in § 3161 (a) – (g) the delay resulting from the request for continuance requested by the parties. In support they state:

1. The government filed this Indictment on April 15, 2014.
2. The Court held an initial appearance and arraignment hearing on June 6, 2014.
3. Previously the Court entered the Order excluding all time between June 6, 2014 and November 17, 2014 from calculating pursuant to the Speedy Trial Act (Document 16).
4. Plea negotiations have been progressing in earnest.
5. The parties believe additional time is likely to result in a negotiated settlement.
6. In addition, the parties believe (i) that failure to grant such a continuance in the proceeding would be likely to make a continuation of such proceeding impossible, or result in a miscarriage of justice; (ii) that the case is so unusual or so complex, due to the number of defendants, the nature of the prosecution, or the existence of novel questions of fact or law, that it is unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself within the time limits established by 18 U.S.C. § 3161; and (iii) that the failure to grant such a continuance in a case which, taken as a whole, is not so unusual or so complex as to fall within clause (ii), would deny counsel for the defendant or the attorney for the government the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

7. I have spoken with Assistant United States Attorneys Joseph R. Baldwin and Bonnie S. Greenberg about this request, and they indicated that the government joins in it.

_____/s/_____
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Counsel for Mr. Taavone Evans

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of October, 2014 a copy of the foregoing Second Joint Motion to Exclude Time from the Requirements of the Speedy Trial Act was delivered electronically to Mr. Joseph R. Baldwin (joseph.baldwin@usdoj.gov) and Ms. Bonnie S. Greenberg (bonnie.greenberg@usdoj.gov), Office of the United States Attorney, 36 South Charles Street, Baltimore, Fourth Floor, Maryland 21201.

_____/s/_____
William L. Welch, III